

Denise Carlon , ESQUIRE
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IN THE MATTER OF:

Adam Czekanski
Elzbieta Czekanski

DEBTORS,

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 18-11160 RG

NOTICE OF OBJECTION

The undersigned, Denise Carlon , Esquire For KML Law Group, P.C., attorney for Secured Creditor **HomeBridge Financial Services, Inc.** , the holder of a Mortgage on the debtors' premises at **47 Homestead Road Elmwood Park, NJ 07407** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. Arrears are estimated to be \$41,871.68, which will be shown on the Proof of claim that will be filed by the Bar date established by the courts
2. Debtor's plan does not provide for payment of Secured Creditor's arrearage claim. The loan modification is remote and speculative. The Debtor cannot modify the loan without the consent of the Secured Creditor. Therefore, the plan cannot be confirmed unless and until a loan modification is agreed to and approved by the Court.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$9,034.68, and does not provide sufficient funding to pay said claim.
4. Accordingly, Debtor's plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/ Denise Carlon , Esquire

Denise Carlon , Esquire
Attorney for HomeBridge Financial Services, Inc.

Dated: March 14, 2018